

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

AGUSTIN FRANCISCO HUNEEUS

Defendant.

)
)
)
)
) Case No. 19-cr-10117-IT
)
)
)
)
)

**DEFENDANT AGUSTIN FRANCISCO HUNEEUS' MOTION TO ALLOW
HIS COUNSEL, JEREMY STERNBERG, TO PARTICIPATE
TELEPHONICALLY AT THE SEPTEMBER 10, 2019 HEARING,
OR IN THE ALTERNATIVE FOR THE HEARING TO BEGIN AT 3:30 PM**

Agustin Francisco Huneus ("Huneus") through his undersigned counsel, respectfully moves this Court to allow his counsel, Jeremy Sternberg, to appear telephonically at the hearing set by this Court for Tuesday, September 10, 2019, or in the alternative for the hearing to begin at 3:30 pm so that he can appear in person.

In support of this motion, Huneus states the following:

1. Attorney Sternberg is lead counsel of record for Huneus in the above-captioned matter.

2. On August 27, 2019, the Court issued an Order setting a hearing date of September 10, 2019. Attorney Sternberg has long-standing plans that require him to be out of state for most of the day on September 10, 2019.

3. Huneus respectfully requests that arrangements be made for Attorney Sternberg to participate telephonically in the hearing, or in the alternative to begin the hearing at 3:30 pm when he will be able to appear in person.

4. Undersigned counsel has conferred about this request with counsel for the

government (AUSA Justin O'Connell) and the government has no objection to this motion. In addition, undersigned counsel has conferred with counsel for the defendants and there is no objection to this motion.

WHEREFORE, for the above reasons, Huneeus respectfully requests that this Honorable Court allow this motion.

Respectfully submitted,

/s/ Jeremy M. Sternberg

Jeremy M. Sternberg (BBO# 556566)

John A. Canale (BBO# 687175)

HOLLAND & KNIGHT LLP

10 St. James Avenue

11th Floor

Boston, Massachusetts 02116

Email: jeremy.sternberg@hklaw.com

john.canale@hklaw.com

Tel: (617) 523-2700

Fax: (617) 523-6850

William P. Keane (Admitted *Pro Hac Vice*)

Farella Braun + Martell LLP

235 Montgomery Street, 17th Floor

San Francisco, CA 94104

Email: wkeane@fbm.com

Tel: (415) 954-4908

Counsel for Agustin Francisco Huneeus

Dated: September 4, 2019

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2019 this document was filed through the ECF system and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants, and to USPO Martha Victoria via email.

/s/ John A. Canale
John A. Canale